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Attorneys for Defendants

**TRULITE GLASS & ALUMINUM SOLUTIONS, LLC,
HERBERT CORTEZ and SHAUN HANNA**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LEE KIRK,

Plaintiff,

VS.

TRULITE GLASS & ALUMINUM
SOLUTIONS, LLC, a Foreign Limited
Liability Company, HERBERT CORTEZ,
an Individual, STEVE WILLIAMS, an
Individual, SHAUN HANNA, an
Individual, DOES I-X; ROE
CORPORATIONS I-X,

Defendants.

Case No. 2:18-CV-00043-JCM-GWF

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME FOR DEFENDANTS TO
RESPOND TO PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

Plaintiff LEE KIRK and Defendants TRULITE GLASS & ALUMINUM SOLUTIONS, LLC, HERBERT CORTEZ, AND SHAUN HANNA (“Defendants”), by and through their undersigned counsel, hereby agree and stipulate to extend the time for Defendants to file their response to Plaintiff’s Complaint, one month, from its current deadline of **February 6, 2018** up to and including **March 6, 2018**.

Insofar as Defendants' counsel was only recently retained in this matter, this extension is being requested in order to give Defendants necessary additional time to look into Plaintiff's

1 allegations and conduct the required diligence necessary to prepare and file their response to the
2 Complaint.

3 This is the first request for an extension of time to respond to the Complaint. This request is
4 made in good faith and not for the purpose of delay.

5 Dated: February 5, 2018

6 Respectfully submitted,

7
8 /s/ Jenny L. Foley
9 JENNY L. FOLEY, PH.D, ESQ.
HJM EMPLOYMENT ATTORNEYS
LLP

10
11 Attorneys for Plaintiff
LEE KIRK

Dated: February 5, 2018

Respectfully submitted,

/s/ Timothy W. Roehrs
MONTGOMERY Y. PAEK, ESQ.
TIMOTHY W. ROEHRHS, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
TRULITE GLASS & ALUMINUM
SOLUTIONS, LLC, HERBERT CORTEZ, and
SHAUN HANNA

13 **ORDER**

14 **IT IS SO ORDERED.**

15 Dated: February 6, 2018.

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19 UNITED STATES MAGISTRATE JUDGE

20 Firmwide:152692339.1 999999.0942